

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION**

NORTH DAKOTA HUMAN RIGHTS	§	
COALITION, IMMIGRANT	§	Civil Action No. 3:23-cv-00160-PDW-ARS
DEVELOPMENT CENTER, and	§	
PLAINTIFF DOE	§	
	§	
Plaintiffs,	§	
v.	§	
	§	
PATRIOT FRONT, THOMAS	§	
ROUSSEAU, TREVOR VALESCU, and	§	
JOHN DOES 1 - 10	§	
	§	
Defendants.	§	

**MOTION TO DISMISS ON BEHALF OF DEFENDANTS ROUSSEAU AND
VALESCU**

Defendants Thomas Rousseau and Trevor Valescu, by and through the undersigned counsel, move to dismiss the Plaintiffs' Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, on the grounds and for the reasons fully set forth in the memorandum filed with this motion.

Respectfully submitted,

MAGANA & VAN DYKE, PLLC

/s/ Jason Lee Van Dyke

Jason Lee Van Dyke

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**Attorney for Thomas Rousseau and Trevor
Valescu**

CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2024, a true and accurate copy of the foregoing were served via ECF procedures of this Court to all counsel of record.

/s/ Jason Lee Van Dyke
JASON LEE VAN DYKE